

**UNITED STATES BANKRUPTCY COURT  
THE DISTRICT OF NEW JERSEY**

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

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*Attorneys for Claimant Evan Plotkin*

In re:

LTL MANAGEMENT, LLC,<sup>1</sup>  
Debtor.

Chapter 11

Case No.: 21-30589 (MBK)

Honorable Michael B. Kaplan

**APPLICATION FOR ORDER FOR ADMISSION  
PRO HAC VICE FOR J. BRADLEY SMITH, ESQUIRE**

**TO: PARTIES ON THE COURT'S ELECTRONIC MAIL NOTICE LIST**

PLEASE TAKE NOTICE that pursuant to Rule 101.1 of the Local Rules for the United States District Court for the District of New Jersey and Rule 9010-1 of the United States Bankruptcy Court for the District of New Jersey, Lex Nova Law, local counsel to Evan Plotkin, hereby makes application before the United States Bankruptcy Court for the District of New Jersey for the entry of an Order granting the admission pro has vice of J. Bradley Smith, Esquire, of the law firm of Dean Omar Branham Shirley, LLP for the purpose of representing Evan Plotkin in the instant Chapter 11 case.

The undersigned relies upon the attached Certification of J. Bradley Smith, Esquire in support of this Application, and the undersigned certifies that he is a member in good standing

with the Bar of the State of New Jersey and admitted to practice before the United States District Court for the District of New Jersey and this Court.

The undersigned hereby requests that if no objection to the within Application is filed within seven (7) days, the Application be granted and the proposed form of Order be entered.

Respectfully submitted,

Dated: April 28, 2022

By: /s/ E. Richard Dressel  
E. Richard Dressel, Esquire  
Lex Nova Law LLC  
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Debtor.

Chapter 11

Case No.: 21-30589 (MBK)

Honorable Michael B. Kaplan

**CERTIFICATION OF J. BRADLEY SMITH IN SUPPORT OF APPLICATION FOR  
ORDER FOR ADMISSION PRO HAC VICE**

In support of my application for admission to the Bankruptcy Court *pro hac vice* I, J. Bradley Smith, Esquire, pursuant to 28 U.S.C. S. 1746, being of full age, hereby certify as follows:

1. I am an attorney with the law firm of Dean Omar Branham Shirley, LLP, with an office located at 302 North Market Street, Suite 300, Dallas, Texas 75202. My telephone number is (214) 722-5990, facsimile number is (214) 722-5991, and e-mail address is [bsmith@dobslegal.com](mailto:bsmith@dobslegal.com)
2. My Texas State Bar number is 24027872 and I have been licensed in Texas since 2000.

3. I am and have been, a member in good standing and admitted to practice before the following Bar of a United States District Court: the Bar of the Northern District of Texas, the Bar of the Eastern District of Texas, and the Bar of the Southern District of Texas.

4. My appearance in this matter will be in association with Movant, E. Richard Dressel, whom I understand is a member in good standing with the Bar of the State of New Jersey and admitted to practice before the United States District Court for the District of New Jersey and this Court.

5. If admitted *pro hac vice*, I agree to abide by the Local Bankruptcy Rules, and to make the payments to the Clerk of the United States Court for the District of New Jersey and the New Jersey Lawyer's Fund for Client Protection as provided in Rule 101 of the Local Rules of the United States District Court for the District of New Jersey.

6. Lex Nova Law will be Applicant's associated local counsel and will accompany Applicant to all hearings as required to by the Court.

I make the above Certification in support of my request to be admitted *pro hac vice* and my request that the Court enter an Order, in substantially in the form attached hereto admitting me to appear *pro hac vice* in this case and related and associated proceedings. I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge and information.

Dated: April 27, 2022

/s/ J. Bradley Smith